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CLERK US DISTRICT COURT  
DISTRICT OF ARIZONA

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA

CR 15-0742 TUC

CKJ  
CBP

United States of America,

Plaintiff,

vs.

Ryan Galal VanDyck,  
(Counts 1 and 2)  
Jannae Knight  
(Count 1)

Defendants.

INDICTMENT

**Violation:**

**18 U.S.C. §§ 2251(a) and (e)  
(Conspiracy to Produce Child  
Pornography)**

**18 U.S.C. §§ 2252A(a)(5)(B) and (b)(2)  
(Possession of Child Pornography)**

**THE GRAND JURY CHARGES:**

**COUNT ONE**

**CONSPIRACY TO PRODUCE CHILD PORNOGRAPHY**

From at least March 2014 to on or about April 10, 2015, within the District of Arizona and elsewhere, the defendants, RYAN GALAL VANDYCK and JANNAE KNIGHT, did knowingly and intentionally combine, conspire, confederate and agree with each other and other persons unknown to the grand jury to employ, use, persuade, induce, entice and coerce a minor to engage in sexually explicit conduct, as that term is defined in Title 18, United States Code, Section 2256(2), for the purpose of producing

any visual depiction of such conduct, using materials that have been mailed, shipped and transported in and affecting interstate and foreign commerce by any means, including a cell phone and computer, all in violation of Title 18, United States Code, Sections 2251(a) and (e).

## COUNT TWO

### POSSESSION OF CHILD PORNOGRAPHY

On or about April 10, 2015, in the District of Arizona, RYAN GALAL VANDYCK did knowingly possess child pornography, that is, visual depictions, the production of which involved the use of minors, including prepubescent minors, engaging in sexually explicit conduct, as defined in Title 18, United States Code, Section 2256(2), and which depicted such conduct, that had been mailed, shipped and transported in interstate and foreign commerce by any means, including computer, and which were produced using materials that had been mailed and shipped and transported in interstate and foreign commerce; that is, RYAN GALAL VANDYCK knowingly possessed a blue HP laptop computer, which contained child pornography videos, which included, but were not limited to, the following computer file: "Lolitashouse - Luba Shasha Vika.avi". All in violation of Title 18, United States Code, Sections 2252A(a)(5)(B) and (b)(2).

A TRUE BILL

**/ s /**

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Presiding Juror

JOHN S. LEONARDO  
United States Attorney  
District of Arizona

**APR 15 2015**

**/ s /**

Carmen F. Corbin  
Assistant U.S. Attorney

REDACTED FOR  
PUBLIC DISCLOSURE